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United States of America  
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IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 MARTIN CONTRERAS,  
15 Defendant.

CASE NO. 1:21-CR-00318-JLT-SKO  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
DATE: March 1, 2023  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

17 1. By previous order, this matter was set for status conference on March 1, 2023.  
18 2. By this stipulation, defendant now moves to continue the status conference until May 17,  
19 2023, and to exclude time between March 1, 2023, and May 17, 2023, under 18 U.S.C. § 3161(h)(7)(A),  
20 B(iv) [Local Code T4].  
21 3. The parties agree and stipulate, and request that the Court find the following:  
22 a) The government has represented that the discovery associated with this case  
23 includes body camera footage, lengthy audio footage, and investigative reports. All of this  
24 discovery has been either produced directly to counsel and/or made available for inspection and  
25 copying.  
26 b) The government has extended a plea offer in this case.  
27 c) Counsel for defendant desires additional time to consult with his client, conduct  
28 investigation and research related to the charges, and review and copy discovery.

1                   d)     Counsel for defendant believes that failure to grant the above-requested  
2     continuance would deny him the reasonable time necessary for effective preparation, taking into  
3     account the exercise of due diligence.

4                   e)     The government does not object to the continuance.

5                   f)     Based on the above-stated findings, the ends of justice served by continuing the  
6     case as requested outweigh the interest of the public and the defendant in a trial within the  
7     original date prescribed by the Speedy Trial Act.

8                   g)     For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
9     et seq., within which trial must commence, the time period of March 1, 2023 to May 17, 2023,  
10    inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
11    because it results from a continuance granted by the Court at defendant's request on the basis of  
12    the Court's finding that the ends of justice served by taking such action outweigh the best interest  
13    of the public and the defendant in a speedy trial.

14          4.     Nothing in this stipulation and order shall preclude a finding that other provisions of the  
15    Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
16    must commence.

17                   IT IS SO STIPULATED.

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20          Dated: February 22, 2023

PHILLIP A. TALBERT  
United States Attorney

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22                   \_\_\_\_\_  
23                   /s/ JESSICA A. MASSEY  
24                   JESSICA A. MASSEY  
25                   Assistant United States Attorney

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28          Dated: February 22, 2023

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/s/ STEVEN L. CRAWFORD  
STEVEN L. CRAWFORD  
Counsel for Defendant  
MARTIN CONTRERAS

1  
2                   **ORDER**  
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4                   IT IS SO ORDERED.  
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6                   DATED: 2/23/2023  
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*Sheila K. Oberto*

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Hon. Sheila K. Oberto  
U.S. Magistrate Judge